

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK**

JEFFREY D. REYNOLDS, on behalf of  
himself and all others similarly situated,

Plaintiff,

v.

XEROX EDUCATION SERVICES, LLC,  
*f/k/a* ACS EDUCATION SERVICES, INC.  
and WELLS FARGO BANK, N.A.,

Defendants.

Case No. 6:13-cv-1223 LEK/TWD

**DECLARATION OF JUSTIN A. KUEHN IN OPPOSITION TO  
DEFENDANTS' MOTION TO DISMISS THE AMENDED COMPLAINT**

Justin A. Kuehn, declares as follows:

1. I am an associate at the law firm Bragar Eigel & Squire, P.C., counsel for plaintiff Jeffrey D. Reynolds ("Plaintiff") and the putative class. I submit this declaration in opposition to defendants Xerox Education Services, LLC's ("Xerox") and Wells Fargo Bank, N.A.'s ("U.S. Bank") (collectively, "Defendants") motion to dismiss.

2. Attached as Exhibit A is a copy of Plaintiff's repayment history for the Consolidated Student Loan (as defined in ¶7 of the Amended Complaint [Dkt No. 50]).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: February 4, 2014

s/Justin A. Kuehn

Justin A. Kuehn